

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Syracuse Mountains Corporation

Plaintiff	Case Number
vs.	
Bolivarian Republic of Venezuela	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Casa Express Corp.

Plaintiff	Case Number
vs.	18-cv-11940-AT
Bolivarian Republic of Venezuela	
Defendant	

Status of Earlier Filed Case:



Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)



Open

(If so, set forth procedural status and summarize any court rulings.)

The complaint in Casa Express was filed on December 18, 2018. On September 30, the Court granted plaintiffs motion for summary judgment and denied the defendant's motion for a stay. On October 16, 2020, the court issued a final judgment and on November 23, 2020 it issued an amended final judgment in favor of Casa Express.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This case, like Casa Express, is a breach-of-contract action against the Bolivarian Republic of Venezuela involving the enforcement of sovereign debt obligations issued by Venezuela. This case and Casa Express involve some of the same series of bonds, issued under the same agreements and with the same terms. As such, both actions will involve common issues of law and fact pertaining to Venezuela's defenses to enforcement of the debt. If these actions are not considered related, there is a risk that the parties could be subject to conflicting orders. Further, there could be a substantial duplication of effort and expense. Venezuela has recognized that enforcement actions against it for its sovereign debt are related by filing a statement of relatedness to that effect. See Statement of Relatedness, Pharo Gaia v. Bolivarian Republic of Venezuela, ECF No. 3, No. 19-cv-3123 (Apr. 8, 2019).

Signature: /s/ Nicolas Swerdloff

Date: March 29, 2021

Hughes Hubbard & Reed

Firm: _____